

How to cite to slip UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Yasmin Mohamed p/k/a Yasminah,

Plaintiff,

v.

Abel Makkonen Tesfaye p/k/a The Weeknd; *et al.*,

Defendants.

Civil Action No.: 1:18-cv-08469-JSR

DECLARATION OF SCOTT BURROUGHS

I, SCOTT BURROUGHS, declare under penalty of perjury of the United States as follows:

1. I am a partner in the firm Doniger / Burroughs, counsel for the plaintiff in the above captioned case. I am an attorney licensed to practice in the State of New York. I am over the age of 18 and have personal knowledge of the following facts, except those stated on information and belief and which I believe to be true.

2. I have attached as Exhibit 1 a true and correct copy, with added brackets, of the Tesfaye deposition transcript.

3. I have attached as Exhibit 2 a true and correct copy of the album cover and track listing for Starboy.

4. I have attached as Exhibit 3 a true and correct copy of UMG's supplemental responses to Plaintiff's pre-motion interrogatories.

5. I have attached as Exhibit 4 a true and correct copy of the exclusive distribution, and license agreement between UMG Recordings, Inc. and XO&co Inc.

6. I have attached as Exhibit 5 a true and correct copy of Exhibit A-2 to the agreement identified in paragraph 5 of this declaration.

7. I have attached as Exhibit 6 a true and correct copy of Tesfaye's SONGS Writer Account Statement for the period of July 1, 2017 through December 31, 2017.

8. I have produced as Exhibit 7 a true and correct copy of the lease agreement for the loft apartment in Tribeca, New York.

9. I have attached as Exhibit 8 a true and correct copy of an article that ran in the New York Post on October 24, 2018.

10. I have attached as Exhibit 9 a New York E-File Payment Receipt.

11. I have attached as Exhibit 10 a true and correct copy of a USA Today article published November 17, 2015.

12. I have attached as Exhibit 11 a true and correct copy, with added brackets, of the Quenneville deposition transcript.

13. I have attached as Exhibit 12 a true and correct copy of an Agreement between the Weeknd XO, Inc., and Jason Quenneville.

14. I have attached as Exhibit 13 a true and correct copy, with added brackets, of the deposition of Jon Payne as person most knowledgeable for the Weeknd XO, LLC.

15. I have attached as Exhibit 14 a true and correct copy of the liner notes for Starboy.

16. I have attached as Exhibit 15 a true and correct copy of the settlement agreement executed between Tesfaye and the Squad Defendants.

17. I have attached as Exhibit 16 a true and correct copy of Westlaw search results for “Universal Music Group.”

18. I have attached as Exhibit 17 a true and correct copy of Judge Guitierrez’s Order in *Louise Rams, et al. v. Def Jam Recordings, et al.*, Case No. CV15-2733 PSG (Ex) (C.D.C.A. Nov. 3, 2015).

19. I have attached as Exhibit 19 a true and correct copy of the ASCAP records for “Starboy.”

20. I have attached as Exhibit 20 a true and correct copy of UMG Recording, Inc. responses to Plaintiff’s interrogatories.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on December 7, 2018

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs, Esq.  
Declarant